

June 5, 2001

The Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on Alkyl Acetate C6-C13 Category

Dear Administrator Whitman:

The following comments on the test plan for the alkyl acetate C6-C13 category are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than nine million Americans.

The ExxonMobil Chemical Corporation has developed a well-constructed, sensible category of structurally and toxicologically similar compounds. ExxonMobil has presented robust summaries that adequately address each health endpoint of the SIDS battery. Any further testing on animals would not contribute to the understanding of the toxicity of these chemicals, and the Corporation appropriately has not called for more tests. We commend the Corporation's comprehensive analysis of existing data and support its conclusion that no additional tests are necessary.

Sincerely,

Nicole Cardello, M.H.S.
Staff Scientist